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AZ. CORP. COMMISSION

LAND AND WATER FUND JUL 11 1 06 PM '94

Legal Aid For The Environment

DOCUMENT
CONTROL

July 6, 1994

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Docket Control Division
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

RE: Docket No. U-0000-94-165

To whom it may concern:

Enclosed for filing is the original and 10 copies of the
Land and Water Fund of the Rockies' APPLICATION FOR LEAVE
TO INTERVENE in the above-captioned docket.

Yours truly,

Eric Blank
Senior Attorney
LAW Fund Energy Project

Frances M. Green
President

Idaho Office

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Boise, ID 83701
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*Serving the
Rocky Mountain West*

Arizona Corporation Commission
DOCKETED

JUL 11 1994

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BEFORE THE ARIZONA CORPORATION COMMISSION

MARCIA WEEKS
Chairman
RENZ D. JENNINGS
Commissioner
DALE H. MORGAN
Commissioner

IN THE MATTER OF THE COMPETITION IN)
THE PROVISION OF ELECTRIC SERVICES) DOCKET NO. U-0000-94-165
THROUGHOUT THE STATE OF ARIZONA.)

CERTIFICATE OF MAILING

I hereby certify that the original and 10 copies of the LAND AND WATER FUND OF THE ROCKIES' APPLICATION FOR LEAVE TO INTERVENE was sent to the Docket Control Division, Arizona Corporation Commission, 1200 West Washington Street, Phoenix, Arizona 85007, and a true and correct copy of the above was placed in the United States mail, postage pre-paid, this 6th day of July, 1994, addressed to the following:

Steven M. Wheeler
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Phoenix, AZ 85007

Ridd M. Mayer

BEFORE THE ARIZONA CORPORATION COMMISSION
Arizona Corporation Commission

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MARCIA WEEKS
Chairman
RENZ D. JENNINGS
Commissioner
DALE H. MORGAN
Commissioner

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IN THE MATTER OF THE COMPETITION IN)
THE PROVISION OF ELECTRIC SERVICES) DOCKET NO. U-0000-94-165
THROUGHOUT THE STATE OF ARIZONA)

APPLICATION FOR LEAVE TO INTERVENE

Pursuant to R14-3-105 of the Rules of Practice and Procedure of the Arizona Corporation Commission ("Commission"), the Land and Water Fund of the Rockies ("LAW Fund") hereby applies for leave to intervene in the above-captioned docket and states as follows:

1. The LAW Fund is an environmental law center serving the Rocky Mountain and Desert Southwest regions of the United States. The LAW Fund is headquartered in Colorado, but has Arizona members and an Arizona steering committee.

2. The Energy Project of the LAW Fund promotes energy efficiency, renewable resources, and other actions that help to minimize the environmental impacts of meeting the demand for energy services. The Energy Project is presently active in regulatory proceedings in Arizona, Colorado, Nevada, New Mexico, Utah and Wyoming and in proceedings initiated by the Western Area Power Administration and the Grand Canyon Visibility Transport

Commission.

3. The Energy Project has participated in a diverse range of Integrated Resource Planning ("IRP"), facility siting, and utility rate case/financial incentive proceedings. In Arizona we were a member of the Externalities Task Force created by the Commission and have participated actively in the proceedings to review the utility IRPs as well as the Arizona Public Service Company Rate Case settlement proceeding (Docket No. U-1345-94-120).

4. The LAW Fund and its members have an interest in wholesale and retail competition in Arizona because such competition can have a substantial effect on the resources that are acquired to meet the demand for energy services and their environmental impacts. In particular, depending on the type of competition proposed there can be a significant influence on utility incentives to invest in energy efficiency and renewable resources, two options that are generally environmentally benign.

6. Intervention by the LAW Fund will not unduly broaden the issues or delay the proceeding.

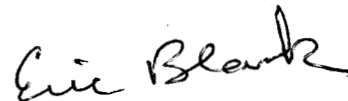
7. Service of all documents should be made on the following:

Bruce Driver, Director/Senior Counsel
Eric Blank, Senior Attorney
LAW Fund Energy Project
2260 Baseline Road
Boulder, CO 80302
Tel: 303-444-1188
Fax: 303-786-8054

WHEREFORE, the LAW Fund requests that it be granted permission to intervene in the above-captioned docket.

Dated: July 6, 1994

Respectfully Submitted,

A handwritten signature in cursive script that reads "Eric Blank". The signature is written in dark ink and is positioned above the typed names.

BRUCE DRIVER, Director/Senior Counsel
ERIC BLANK, Senior Attorney
LAW Fund Energy Project